Exhibit B

UNITED	STATES	DIST	RICT	COUR:	Г
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UNITED STATES OF AMERICA,) ECF Case
Plaintiff,) CASE NO.: 1:14-cr-00277-DLI
- against -	}
SYED IMRAN AHMED, M.D.,	}
Defendant.	

DECLARATION OF ANTHONY M. GERITANO

I, Anthony M. Geritano, hereby declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

- 1. I am Paralegal Coordinator at the law firm of Wilson Sonsini Goodrich & Rosati,
 P.C., counsel for Syed Imran Ahmed in this action. I have personal knowledge of the facts set forth
 herein, and if called as a witness I could testify competently to them.
- 2. On June 17, 2014 at approximately 3:40 p.m., I called the Metropolitan Detention Center's ("MDC") general number (718-840-4200) to determine how we may obtain approval for an un-monitored telephone call with our client, Dr. Ahmed. I was told to call back the following morning and speak to Dr. Ahmed's inmate counselor, Mr. Murray.
- 3. On June 18, 2014 at approximately 9:10 a.m., I called the MDC general number and asked to be transferred to Dr. Ahmed's inmate counselor, Mr. Murray. I was transferred to the wrong extension. A few minutes later, I again called the MDC general number and asked to be

transferred to Dr. Ahmed's inmate counselor, Mr. Murray. Again, I was transferred to the wrong extension.

- 4. On June 18, 2014 at approximately 9:37 a.m., I again called the MDC general number and asked to be transferred to Dr. Ahmed's inmate counselor Mr. Murray. I explained that I had been transferred to the wrong extension the past two times I called asking to speak with Mr. Murray. I was told that the MDC internal directory is not up to date, and thus callers are transferred to the wrong extensions. Instead of transferring the call, an MDC employee paged Mr. Murray but received no response. I then was transferred to Mr. Murray's supervisor, Mr. Wilkins. I left a voicemail for Mr. Wilkins.
- 5. On June 18, 2014 at approximately 1:20 p.m., I again called the MDC general number. Since I previously was told that the MDC internal directory is out of date, I requested that Mr. Murray be paged. He did not respond. I then asked again to be transferred to Mr. Murray's supervisor, Mr. Wilkins. I received Mr. Wilkins's voicemail; however, I did not leave a message since I previously left a message earlier that day.
- 6. On June 18, 2014 at approximately 1:52 p.m., I again called the MDC general number. Since I previously was told that the MDC internal directory is out of date, I requested that Mr. Murray be paged. He did not respond. I then asked again to be transferred to Mr. Murray's supervisor, Mr. Wilkins. I received Mr. Wilkins's voicemail; however, I did not leave a message since I previously left a message earlier that day.
- 7. On June 19, 2014 at approximately 10:25 a.m., I again called the MDC general number. Since I previously was told that the MDC internal directory is out of date, I requested that Mr. Murray be paged. He did not respond. I then asked again to be transferred to Mr. Murray's

supervisor, Mr. Wilkins. I received Mr. Wilkins's voicemail; however, I did not leave a message since I already left a voicemail on June 18, 2014.

- 8. On June 20, 2014 at approximately 9:45 a.m., I again called the MDC general number. Since I previously was told that the MDC internal directory is out of date, I requested that Mr. Murray be paged. He did not respond. I then asked to be transferred to Mr. Murray's extension but I was transferred to the wrong extension (the extension for Mr. Jones). I was told that the extension I was transferred to was in fact Mr. Murray's extension, but that the MDC has the incorrect name and voicemail associated with his extension. I was instructed to leave a voicemail, which I did.
- 9. On June 20, 2014 at approximately 9:48 a.m., I again called the MDC general number and asked to be transferred to Mr. Murray's supervisor, Mr. Wilkins. I received Mr. Wilkins's voicemail. I did not leave a message since I had left a message on June 18, 2014 to which I have received no response.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on June 20, 2014.

Anthony M. Geritano

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